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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMON MALDONADO, JR.,

Defendant.

CASE NO. 1:23-CR-169 JLT-SKO

STIPULATION AND ORDER REGARDING
EXCLUDABLE TIME PERIODS UNDER SPEEDY
TRIAL ACT

DATE: May 29, 2024
TIME: 1:00 p.m.
COURT: Hon. Sheila K. Oberto

STIPULATION

1. By previous order, this matter was set for status on May 29, 2024.
2. By this stipulation, defendants now move to continue the status conference until August 21, 2024, and to exclude time between May 29, 2024, and August 21, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes 290 Bates Stamped pages of material, including recordings and photographs. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b) Counsel for defendant MALDONADO desires additional time to consider the government's plea offers dated September 6, 2023.
 - c) Counsel for defendant believes that failure to grant the above-requested

1 continuance would deny them the reasonable time necessary for effective preparation,]taking
2 into account the exercise of due diligence.

3 d) The government does not object to the continuance.

4 e) Based on the above-stated findings, the ends of justice served by continuing the
5 case as requested outweigh the interest of the public and the defendant in a trial within the
6 original date prescribed by the Speedy Trial Act.

7 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
8 et seq., within which trial must commence, the time period of May 29, 2024 to August 21, 2024,
9 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
10 because it results from a continuance granted by the Court at defendant's request on the basis of
11 the Court's finding that the ends of justice served by taking such action outweigh the best interest
12 of the public and the defendant in a speedy trial.

13 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
14 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
15 must commence.

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1 IT IS SO STIPULATED.

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3 Dated: May 15, 2024

PHILLIP A. TALBERT
United States Attorney

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5 /s/ KAREN A. ESCOBAR
KAREN A. ESCOBAR
6 Assistant United States Attorney

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8 Dated: May 15, 2024

/s/ Alekxia L. Torres Stalling
Alekxia L. Torres Stalling
9 Counsel for Defendant
Ramon Maldonado, Jr.
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ORDER

15 IT IS SO ORDERED.

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17 DATED: 5/15/2024

Sheila K. Oberto
The Honorable Sheila K. Oberto
18 UNITED STATES MAGISTRATE JUDGE
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